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11 Attorneys for Movant
12 Victoria Castro

13 UNITED STATES BANKRUPTCY COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 In re

17 The Roman Catholic Archbishop of San
18 Francisco,

19 Debtor.

) Case No.: 23-30564
) Chapter 11

) RS No. CCR-507

) DECLARATION OF DMITRIY
) KARPOV, ESQ. IN SUPPORT
) MOTION FOR RELIEF FROM
) STAY TO PROCEED WITH
) STATE COURT LITIGATION

) Date: November 9, 2023

) Time: 1:30 p.m.

) Hearing: Via Tele/Video Conference

20 I, DMITRIY KARPOV, declare as follows:

21 1. I am an attorney licensed to practice in the state of California, and am an
22 attorney with the law firm of B&D Injury Law Group APLC, which are attorneys of record
23 for Movant Victoria Castro in an action for personal injuries entitled *Victoria Castro v. All*
24 *Souls Catholic School; Archdiocese of San Francisco Parish, et al*, Case No. 19-CIV-06416,
25 filed in the Superior Court of California, County of San Mateo (the "State Court Action").

26 2. I have firsthand personal knowledge of the matters set forth herein and, if
27 called upon to do so, could and would competently testify thereto.

28 3. The complaint commencing the State Court Action was filed on October 29,

1 2019 and alleges a claim for personal injuries. Attached hereto as Exhibit "A" is a true and
2 correct copy of the Complaint (the "Complaint").

3 4. The case has been actively litigated since filing and had been set for a jury trial
4 for November 27, 2023. That trial date was vacated after counsel for defendants filed a
5 Notice of Stay of Proceedings on September 12, 2023.

6 5. In response to discovery requests served in the State Court Action, Defendants
7 advised that there are insurance policies in effect that may provide coverage for the claims
8 alleged in the Complaint. Attached hereto as Exhibit "B" is a true and correct copy of the
9 Defendant's response to Form Interrogatory No. 4.1 regarding the insurance coverage.

10 6. Plaintiff seeks relief from stay to proceed to trial with any recovery limited to
11 the extent of insurance coverage.

12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct.

14 Executed this 25th day of October, 2023.

15 
DMITRIY KARPOV